

Guillermo Haro
February 13, 2020

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Robert Steven Cutler, individually)	Case No.:
and as Administrator of the Estate)	18-CV-00383-TUC-FRZ
of David A. Cutler, deceased, on)	
behalf of himself and on behalf of)	
all beneficiaries of the Estate of)	
David A. Cutler, deceased, and)	
Renee Luddington Cutler,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
Mark D. Napier, Sheriff of Pima)	
County, Arizona, in his official)	
capacity; Rural/Metro Fire Dept.,)	
Inc., an Arizona for profit)	
corporation, Keith Barnes and Jane)	
Doe Barnes, his spouse, Grand Reed)	
and Brittany Reed,)	
)	
Defendants.)	
)	

VIDEOTAPED DEPOSITION OF GUILLERMO HARO

Chandler, Arizona
February 13
10:02 a.m.

	BARTELT NIX COURT REPORTERS
	RRF No. 1028
	111 W. Monroe Street, Suite 425
Prepared by:	Phoenix, Arizona 85003
Helen Pasewark, CR, RPR	Phone: (602) 254-4111
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1 know, with the numbers.

2 MR. SATTERLEE: Can you read the question back
3 just so it is clear.

4 (Question read as follow:

5 "And to the extent that's what it
6 shows, that you spent more time at your job at
7 the University of Arizona, that it's inaccurate
8 to say that you spent the majority of your
9 professional time teaching?")

10 THE WITNESS: According to what I say here,
11 right, that's what you're saying. And -- okay. So I
12 want to go back to the point is that it's just -- I
13 understand that you're thinking of time, how much time
14 you're spending at one time and how much you are doing.
15 I'm talking about effort, passion, what I want to do.
16 To me that is the majority of my -- my willingness to do
17 something for somebody else as far as teaching, is
18 that's where my focus is at.

19 I understand that I worked for the U of A
20 and I spent some time doing that and that was a good
21 project, but my focus is that as teaching at the same
22 time. And so my majority of my focus was on that time
23 teaching. And so I agree, maybe the numbers don't
24 reflect that, but that's how I feel about it.

25